

HOWARD & HOWARD ATTORNEYS PLLC

W. West Allen, Esq.
Nevada Bar No. 5566
Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
John (Trey) Pictum, Esq.
Nevada Bar No. 15979
HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, Nevada 89169
Telephone: (702) 257-1483
Email: wwa@h2law.com
Email: jwf@h2law.com
Email: jjp@h2law.com

Attorneys for Plaintiff
Prime Corporate Services, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PRIME CORPORATE SERVICES, LLC, a
Utah limited liability company,

Plaintiff,

vs.

BUSINESS CREDIT CONSULTING, INC.,
a Nevada corporation; FRED SEYMOUR,
an individual; CATHERINE FERRUGIA,
an individual; and DANIEL WILLIAMS,
an individual,

Defendants.

Case No. 2:25-cv-00198-GMN-DJA

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME**

(First Request)

Plaintiff Prime Corporate Services, LLC (“Prime” or “Plaintiff”) on the one hand, and Defendants Business Credit Consulting, Inc. (“BCC”), Fred Seymour (“Mr. Seymour”), Catherine Ferrugia (“Ms. Ferrugia”), and Daniel Williams (“Mr. Williams”) (BCC, Mr. Seymour, Ms. Ferrugia, and Mr. Williams all together the “Defendants”), on the other hand, hereby agree and stipulate to extend the time for the parties to conduct their Rule 26(f) discovery planning conference and, in support of their stipulation, state the following:

1. Plaintiff filed its Verified Complaint for Injunctive Relief and Damages (ECF No. 1) on January 30, 2025. (ECF No. 1.)

2. LR 26-1(a) requires the Plaintiff or the Plaintiff’s attorney to initiate the Fed. R. Civ. P. 26(f) discovery planning conference within 30 days after the first defendant answers or

1 otherwise appears.

2 3. The Defendants filed their Answer and BCC filed its Counterclaim on March 7,
3 2025. (ECF No. 7.)

4 4. Accordingly, the deadline for Plaintiff to initiate the Fed. R. Civ. P. 26(f) discovery
5 planning conference is April 7, 2025.

6 5. The parties are presently engaged in determining whether this case can be settled
7 or whether it must proceed. The parties' counsels have participated in an exploratory settlement
8 discussion, and the Defendants have provided certain financial and other information requested
9 by Plaintiff.

10 6. To allow Plaintiff sufficient time to review the information and documents
11 provided by the Defendants and for the parties to otherwise determine whether this case can be
12 settled, the parties hereby agree and stipulate to extend the time for conducting their Rule 26(f)
13 discovery planning conference from April 7, 2025 up to and through May 7, 2025.

14 **IT IS SO AGREED AND STIPULATED:**

15 HOWARD & HOWARD ATTORNEYS PLLC HOGAN HULET, PLLC


16 By: /s/ Jonathan W. Fountain
17 W. West Allen, Esq.
18 Nevada Bar No. 5566
19 Jonathan W. Fountain, Esq.
20 Nevada Bar No. 10351
21 John (Trey) Pictum, Esq.
22 Nevada Bar No. 15979
23 3800 Howard Hughes Parkway, Suite 1000
24 Las Vegas, Nevada 89169

25 *Attorneys for Plaintiff*
26 *Prime Corporate Services, LLC*

By: /s/ Kenneth E. Hogan
Kenneth E. Hogan, Esq.
Nevada Bar No. 10083
10105 W. Gowan Rd., Suite 260
Las Vegas, Nevada 89129

Attorneys for Defendants
Business Credit Consulting, Inc.
Fred Seymour,
Catherine Ferrugia, and
Daniel Williams

27 **IT IS SO ORDERED:**

28 
UNITED STATES MAGISTRATE JUDGE

DATED: 4/8/2025

HOWARD & HOWARD ATTORNEYS PLLC